

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36

Annual Section 64.2009(e) CPNI Certification for 2008

Date Filed: February 26, 2009

Name of companies covered by this certification:

- Conterra Ultra Broadband, LLC (Filer ID 823694)
- Conterra Wireless Broadband, LLC (Filer ID 826946)

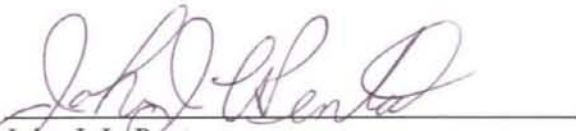
Name and Title of Signatory: John La Penta, Senior Vice President and General Counsel,
Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC

I, John La Penta, certify that I am an officer of both Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC (for purposes of this certification, collectively referred to as "Conterra" or the "Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, in the court system, or at the Commission) against data brokers during 2008. The company did not receive any customer complaints during 2008 concerning the unauthorized release of CPNI.

The Company does not have any information outside of the information filed in Docket No. 96-115 or that is publicly available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are highlighted in the attached document.



John J. LaPenta
Senior Vice President and General Counsel
Conterra Ultra Broadband, LLC
Conterra Wireless Broadband, LLC

Date: 2-24-09

**Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC
Statement Regarding Customer Proprietary Network Information Operating Procedures**

Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC (collectively "Conterra"), in accordance with section 64.2009(e), submit this statement summarizing how Conterra's operating procedures are designed to ensure compliance with the Commission's CPNI rules. Each company provides exclusively broadband (backhaul) services to schools and libraries. This statement summarizes the procedures that each company has implemented to safeguard the CPNI of its respective customers.

Conterra values its customers' privacy, and takes measures to ensure that it protects CPNI. It is Conterra's policy to protect the confidentiality of its customers' information. Conterra does not use, disclose, or permit access to its customers' CPNI except as such use, disclosure, or access is permitted under Section 222 of the Communications Act of 1934, as amended, and the Commission's implementing rules.

As necessary, Conterra may use CPNI for the permissible purposes enumerated in the Act and the Commission's rules, including, but not limited to, initiating, rendering, billing, and collecting for telecommunications services. The company also may use CPNI to protect its rights or property.

Conterra has a process in place for verifying its customers' identity during an in-bound call. Conterra does not release call detail information during an in-bound call.

Conterra trains its personnel in the use of CPNI. Conterra has an express disciplinary process in place for violation of the company's CPNI policies.

Conterra does not use CPNI to market products and services to customers outside of the category of service to which the customer already subscribes. Conterra also does not share CPNI with its affiliates or third parties for marketing purposes. If, in the future, Conterra seeks to use CPNI for these purposes, then it will provide the appropriate notice to customers and will maintain a list of customer preferences. Conterra also will maintain a record of any marketing campaign in accordance with the Commission's rules.

Conterra takes reasonable measures to discover and protect against attempts to gain against unauthorized access to CPNI. Conterra has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach that results in the unauthorized access to, use, or disclosure of CPNI. Conterra will maintain a record of the notification in accordance with the Commission's rules.

Conterra has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.